

1 FISH & RICHARDSON P.C.  
 2 Rodeen Talebi (SBN 320392)  
 3 4695 MacArthur Court, Suite 1100  
 4 Newport Beach, CA 92660  
 Telephone: 949-623-7640  
 Facsimile: 858-678-5099

5 Neil J. McNabnay (*pro hac vice pending*)  
 6 Lance E. Wyatt (*pro hac vice pending*)  
 Alexander H. Martin (*pro hac vice pending*)  
 7 FISH & RICHARDSON P.C.  
 8 1717 Main Street, Suite 5000  
 Dallas, Texas 75201  
 Telephone: 214-747-5070  
 Facsimile: 214-747-2091

10  
 11 **UNITED STATES DISTRICT COURT**  
 12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

13 **VOLTSTAR TECHNOLOGIES, INC.,**

14 **PLAINTIFF,**

15 **v.**

16 **GC TECHNOLOGY, LLC DBA**  
 17 **PHONESUIT,**

18 **DEFENDANT.**

19 **CASE NO. 2:25-CV-01036-AJR**

20 **STIPULATION TO EXTEND TIME TO**  
 21 **RESPOND TO INITIAL COMPLAINT BY**  
 NOT MORE THAN 30 DAYS (L.R. 8-3)

22 **Complaint served: February 25, 2025**  
 23 **Current response date: March 18, 2025**  
 24 **New response date: April 17, 2025**

25 **Courtroom: 780**  
 26 **Judge: Hon. A. Joel Richlin**

27 Pursuant to Local Rule 8-3, Plaintiff Voltstar Technologies, Inc. (“Plaintiff”) and  
 28 Defendant GC Technology, LLC dba Phonesuit (“Defendant”), by and through their respective  
 counsel, hereby stipulate and agree as follows:

29  
 30 1. WHEREAS, Plaintiff filed its Complaint on February 6, 2025 (Dkt. 1);  
 31 2. WHEREAS, Plaintiff served its Complaint on February 25, 2025;

3. WHEREAS, Defendant is required to answer or otherwise respond to the Complaint by March 18, 2025;

4. WHEREAS, Defendant recently retained Fish & Richardson P.C. as counsel in this matter;

5. WHEREAS, counsel for the parties have jointly agreed, subject to the approval of the Court, to a 30-day extension for Defendant to answer or otherwise respond to the Complaint;

6. WHEREAS, the parties believe that good cause exists for this extension for a number of reasons, including to permit counsel for Defendant sufficient time to investigate the allegations set forth in Plaintiff's Complaint, consult with their client, and consider an appropriate response;

7. WHEREAS, no party will be prejudiced by the relief sought;

8. WHEREAS, trial will not be delayed because the Court has not set a trial date, and this brief extension will not impact other deadlines in this case; and

9. WHEREAS, the present extension is not sought for any improper purpose.

WHEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES that the time for Defendant to answer or otherwise plead to the Complaint in the above-captioned action shall be, and hereby is, extended by 30 days to April 17, 2025.

Dated: March 17, 2025

SRIPLAW, P.A.

/s/ Matthew L. Rollin with permission

Matthew L. Rollin (SBN 332631)

SRIPLAW, P.A.

8730 Wilshire Boulevard

Suite 350

Beverly Hills, California 90211

323.452.5600 – Telephone

561.404.4354 – Facsimile

COUNSEL FOR PLAINTIFF  
VOLTSTAR TECHNOLOGIES, INC.

1 Dated: March 17, 2025

FISH & RICHARDSON P.C.

2 /s/ Rodeen Talebi

3 Rodeen Talebi (SBN 320392)  
4 4695 MacArthur Court, Suite 1100  
5 Newport Beach, CA 92660  
Telephone: 949-623-7640  
Facsimile: 858-678-5099

6 COUNSEL FOR DEFENDANT  
7 GC TECHNOLOGY, LLC DBA PHONESUIT